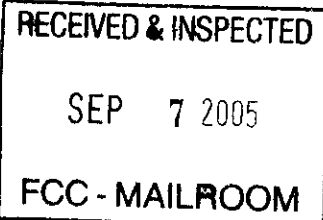


September 2, 2005

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW Washington, DC 20554

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RE: WT Docket 05-196

JeffCom 9-1-1 is the primary Public Safety Answering Point (PSAP) in Jefferson County, WA. We are a small agency, with limited budget, and answer 9-1-1 calls for a population of about 28,000 citizens. We dispatch police, fire, and medical services to citizens in crisis.

We support the FCC's ruling to require interconnected VoIP providers to ensure they are able to deliver accurate location and call back information to the PSAP when their customer calls 9-1-1.

We routinely encounter traumatized citizens who are unable to provide us with an adequate description of their location. Many times people lose focus during a crisis and are not able to recall simple details such as their address. That same phenomenon has kept callers from choosing the phone with adequate 9-1-1 capabilities when they encountered a crisis and had more than one phone in their home. There is also potential for citizens in crisis to be restricted to an area where they cannot access the phone with adequate 9-1-1 capabilities, such as during an abduction, home invasion, or domestic violence situation. *The VoIP providers fail to understand that the vast majority of citizens have a standard of expectation that a functioning telephone will reach 9-1-1 in an emergency.*

We ask that the Commission not extend the 120 day deadline for interconnect. *VoIP providers must provide enhanced 9-1-1 services to their customers. They were very aware of this problem and failed to act prior to saturating the market with these devices.* Please ensure that any requirements imposed on VoIP providers do not cause undue burden on our smaller PSAP's ability to process and dispatch an emergency response to a 9-1-1 call. Finally, please ensure that the Commission's rules take in to consideration the operational requirements of the current PSAP infrastructure and not impose rules that will require considerable upgrades or replacement of PSAP equipment for those of us on limited budgets.

Sincerely,



Donna Hamlin, Interim Director

cc: APCO International Office of Legislative Affairs

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